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May 25, 2022

Via ECF

Judge Jesse M. Furman
United States District Court, Southern District Of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1105
New York, New York 10007

Re: Adams v. 122 East 7th Street Associates, LLC et al.;
Case No. 1:22-cv-01883-JMF

Your Honor:

We represent defendant 122 East 7th Street Associates LLC¹ ("122 East 7th Street") in the above-referenced action. Pursuant to Your Honor's Individual Rules and Practices in Civil Cases, 122 East 7th Street hereby submits this letter to request an extension of time to answer, move, or otherwise respond to Plaintiff Joshua Adams' Complaint, filed on March 4, 2022.

On or about March 22, 2022, Plaintiff served the Complaint upon 122 East 7th Street. As such, 122 East 7th Street's time to answer, move or otherwise respond to the Complaint was on April 12, 2022. We seek this extension due to the fact that we were just retained to represent 122 East 7th Street and we require additional time to investigate the matter. Counsel for Plaintiff Joshua Adams, Maria-Costanza Barducci, Esq., has consented to extend 122 East 7th Street's time to answer, move or otherwise respond to the Complaint to June 30, 2022. No prior extensions have been requested. Accordingly, 122 East 7th Street respectfully requests that the Court grant its request for an extension.

Additionally, 122 East 7th Street respectfully requests that the Court adjourn to a date after June 30, 2022 the following three events: 1) the Initial Pretrial Conference, currently scheduled for June 14, 2022 at 4:30 PM; 2) the deadline for the Parties to participate in mediation, currently May 31, 2022 (two weeks prior to the Initial Pretrial Conference); and 3) the deadline for the parties to file a joint letter and proposed Civil Case Management Plan and Scheduling Order, currently June 9,

¹ Defendant 122 East 7th Street Associates LLC is incorrectly identified in the case caption as "122 East 7th Street Associates, LLC."

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2022 (the Thursday of the week prior to the Initial Pretrial Conference). Ms. Barducci has also consented to this request.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Lisia Leon

Lisia Leon

cc: Maria-Costanza Barducci, Esq., counsel for Plaintiff Joshua Adams (via ECF and electronic mail to mc@barduccilaw.com)

Application GRANTED. In addition, the initial pretrial conference is adjourned to **July 26, 2022, at 3:15 p.m.** The related deadlines for mediation and the submission of a joint letter and proposed case management plan should be determined from new date of the initial conference. The Clerk of Court is directed to terminate ECF No. 15.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Jesse M. Furman', is written over a light blue horizontal line.

May 25, 2022